



O.E.P.A.  
S.E.D.O.

CLOW WATER SYSTEMS COMPANY

2005 MAY -2 PM 12:43

2266 South Sixth Street  
P.O. Box 6001  
Coshocton, Ohio 43812  
(740) 622-6651  
FAX (740) 622-8551

April 29, 2005

Zach Hamlin  
Division of Air Pollution Control  
Ohio Environmental Protection Agency  
Southeast District Office  
2195 Front Street  
Logan, Ohio 43138-9031

Director  
Air and Radiation Division  
USEPA Region 5  
77 W. Jackson Blvd,  
R-19J Chicago, Illinois 60604

Reference: Title V Certification Report

Dear Mr. Hamlin,

Enclosed is the Title V Certification Report filled out as required. If you have questions or need additional info please feel free to contact me.

W. Patrick Huth

Environmental Manager

Ohio EPA Use Only

Date Received:

Staff Reviewer:

Date Reviewed:

O.E.P.A.  
S.E.D.

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## Compliance Certification Section I - Facility Information

Complete this section of the form only once for the facility (See "Compliance Certification Section IV" under the "Clarifying Instructions" at the end of this document for important additional information in filling out this part of the form.)

- A. Facility Name: Clow Water Systems Company
- B. Facility Address: 2266 South Sixth Street
- C. Facility ID [10 digits]: 06-16-01-0006
- D. Date of Title V Permit Issuance: 06/08/00
- E. Reporting Period (usually the preceding calendar year): 2004

## Compliance Certification Section II - General Terms and Conditions (Part I of the Permit)

Complete this section of the form only once for the facility (See "Compliance Certification Section II" under the "Clarifying Instructions" at the end of this document for important additional information in filling out this part of the form)

- F. Has your company complied with all the General Terms and Conditions stated in Part I (A) of the Title V permit?  X  YES   NO

If no, indicate the paragraph number for each General Term and Condition for which compliance was not maintained, a description of the excursion/deviation, and a description of the corrective action that was taken to ensure that compliance will be maintained in the future.

16.	It was determined that changes and modifications to equipment made in 1998 may have potentially constituted a modification under PSD and PTI rules.	Clow has conducted a comprehensive review to determine if the PSD and PTI modification requirements would have been triggered. Clow and Ohio EPA have entered in a Director's Final Findings and Orders to address any PSD/PTI issues. Clow has submitted appropriate applications to resolve outstanding issues and expects to receive appropriate permits from Ohio EPA in the near future.
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## Compliance Certification Section III - Facility Terms and Conditions (Part II of the Permit)

Complete this section of the form only once for the facility (See "Compliance Certification Section III" under the "Clarifying Instructions" at the end of this document for important additional information in filling out this part of the form.)

- G. Provide for each term and condition in Part II.A "State and Federally Enforceable Section", by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Please place an "X" in only one of the two options below	
X	Each IEU listed in Part II.A of the Title V permit has complied with each applicable requirement established in the listed Permit To Install (PTI) and each applicable requirement specified in OAC Chapter 3745-17, OAC Chapter 3745-18, and/or OAC Chapter 3745-21.
	Except as indicated for each IEU listed in the following table below, each IEU listed in Part II.A of the Title V permit has complied with each applicable requirement established in the listed Permit To Install (PTI) and each applicable requirement specified in OAC Chapter 3745-17, OAC Chapter 3745-18, and/or OAC Chapter 3745-21. (Please identify each intermittent compliant IEU in a separate row in the table below as applicable.)

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance*	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
N/A	N/A	N/A	N/A	N/A

- H. Any other material information that may indicate non-compliance with one or more of the above-described applicable requirements for this facility must be described below:

None

## Compliance Certification Section IV - Significant Emissions Units Terms and Conditions (Part III of the Permit)

Complete this section of the form for each significant emissions unit. Emissions units with identical terms and conditions may be grouped together (See "Compliance Certification Section IV" under the "Clarifying Instructions" at the end of this document for important additional information in filling out this part of the form.)

I. Significant Emissions Unit ID [4 characters]: F002

J. Provide for each term and condition in Part III.A "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a **brief** statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period. *Please add rows as necessary for each Emission Limitation/Control Measure specified in Part III.A.I.1 of the permit.*

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance*	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1. 0.03 gr/dscf or no visible emissions, whichever is less stringent	Emissions testing if required. Procedures specified in 40 CFR Part 60, Appendix A, Method 22.	I		
		C		
I.1. 16 tpy of particulate emissions	Multiplying the allowable particulate emission rate of 0.030 gr/dscf by the maximum flow rate of the control equipment for this emission unit, times the actual hours of operation during the calendar year, and then dividing by 2000 lbs/ton	C		
I.2.a. Fugitive emissions from the sand cooling drum shall be collected sufficiently to eliminate visible particulate emissions...	N/A	C	Baghouse malfunctions reported on March 4, 2004 and October 18, 2004	
I.2.b.	N/A	N/A	N/A	N/A
II.	N/A	N/A	N/A	N/A
III.1.	Records of daily checks are maintained on-site	C		
IV.1.	Copies of semi-annual reports are maintained on-site.	C		
V.1.	Copies of any required stack tests are maintained on-site.	C		

V.2.	Copies of any required stack tests are maintained on-site.	C		
V.3.	Multiplying the allowable particulate emission rate of 0.030 gr/dscf by the maximum flow rate of the control equipment for this emission unit, times the actual hours of operation during the calendar year, and then dividing by 2000 lbs/ton	C		
VI.	N/A	N/A	N/A	N/A

I. Significant Emissions Unit ID [4 characters]: F004

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1.	N/A	N/A	N/A	N/A
I.2.a.	N/A	N/A	N/A	N/A
II.	N/A	N/A	N/A	N/A
III.	N/A	N/A	N/A	N/A
IV.	N/A	N/A	N/A	N/A
V.	N/A	N/A	N/A	N/A
VI.	N/A	N/A	N/A	N/A

I. Significant Emissions Unit ID [4 characters]: F006

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1.	N/A	N/A	N/A	N/A
I.2.a.	N/A	N/A	N/A	N/A
II.	N/A	N/A	N/A	N/A
III.	N/A	N/A	N/A	N/A
IV.	N/A	N/A	N/A	N/A
V.	N/A	N/A	N/A	N/A
VI.	N/A	N/A	N/A	N/A

I. Significant Emissions Unit ID [4 characters]: F007

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1.	N/A	N/A	N/A	N/A
I.2.a.	N/A	N/A	N/A	N/A
II.	N/A	N/A	N/A	N/A
III.	N/A	N/A	N/A	N/A
IV.	N/A	N/A	N/A	N/A
V.	N/A	N/A	N/A	N/A
VI.	N/A	N/A	N/A	N/A

I. Significant Emissions Unit ID [4 characters]: F008

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1.	N/A	N/A	N/A	N/A
I.2.a.	N/A	N/A	N/A	N/A
II.	N/A	N/A	N/A	N/A
III.	N/A	N/A	N/A	N/A
IV.	N/A	N/A	N/A	N/A
V.	N/A	N/A	N/A	N/A
VI.	N/A	N/A	N/A	N/A



I. Significant Emissions Unit ID [4 characters]: F009

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1.	N/A	N/A	N/A	N/A
I.2.a.	N/A	N/A	N/A	N/A
II.	N/A	N/A	N/A	N/A
III.	N/A	N/A	N/A	N/A
IV.	N/A	N/A	N/A	N/A
V.	N/A	N/A	N/A	N/A
VI.	N/A	N/A	N/A	N/A

I. Significant Emissions Unit ID [4 characters]: F010

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1.	N/A	N/A	N/A	N/A
I.2.a.	N/A	N/A	N/A	N/A
I.2.b.	N/A	N/A	N/A	N/A
II.	N/A	N/A	N/A	N/A
III.	N/A	N/A	N/A	N/A
IV.	N/A	N/A	N/A	N/A
V.	N/A	N/A	N/A	N/A
VI.	N/A	N/A	N/A	N/A

I. Significant Emissions Unit ID [4 characters]: F011

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1.	N/A	N/A	N/A	N/A
I.2.a.	N/A	N/A	N/A	N/A
II.	N/A	N/A	N/A	N/A
III.	N/A	N/A	N/A	N/A
IV.	N/A	N/A	N/A	N/A
V.	N/A	N/A	N/A	N/A
VI.	N/A	N/A	N/A	N/A

I. Significant Emissions Unit ID [4 characters]: F012

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?"	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1.	N/A	N/A	N/A	N/A
I.2.a.	N/A	N/A	N/A	N/A
II.	N/A	N/A	N/A	N/A
III.	N/A	N/A	N/A	N/A
IV.	N/A	N/A	N/A	N/A
V.	N/A	N/A	N/A	N/A
VI.	N/A	N/A	N/A	N/A

I. Significant Emissions Unit ID [4 characters]: F014

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1. 9.75 tpy of VOC based upon a rolling, 12-month summation	Monthly calculation of pounds VOC per ton of sand emission factor multiplied by the tons of sand used, and divided by 2000 pounds per ton; added to the previous 11 months emissions in tons VOC	C		
I.1. Total particulate emissions shall not exceed 0.03 gr/dscf (0.46 lb/hr at maximum capacity) or no visible emissions, whichever is less stringent.	Emissions testing if required. Procedures specified in 40 CFR Part 60, Appendix A, Method 22.	C		
I.1. Total particulate emissions shall not exceed 2.03 tpy	Multiplying the allowable particulate emission rate of 0.030 gr/dscf by the maximum flow rate of the control equipment, times the actual hours of operation during the calendar year, and then divide by 2000 lbs/ton	C		
I.1. 3.25 lb/hr of VOC	One time calculation of the maximum tons of sand processed in this emission unit per hour, 5 tons/hour, multiplied by the VOC emission factor of 0.65 lb of VOC/ton of sand	C		
I.2.a.	Monthly calculation of pounds VOC per ton of sand emission factor multiplied by the tons of sand used, and divided by 2000 pounds per ton; added to the previous 11 months emissions in tons VOC	C		
I.2.b.	N/A	N/A	N/A	N/A
I.2.c.	N/A	N/A	N/A	N/A
I.2.d.	N/A	N/A	N/A	N/A
II.	N/A	N/A	N/A	N/A
III.1.	Copies of daily checks are maintained on-site.	C		
III.2.	Monthly records are maintained on-site.	C		
IV.1.	Copies of deviation reports are maintained on-site. N/A	C		
IV.2.	Copies of annual reports are maintained on-site. N/A	C		
IV.3.	Copies of semi-annual reports are maintained on-site.	C		
V.1.	Monthly calculation of pounds VOC per ton of sand emission factor multiplied by the tons of sand used, and divided by 2000 pounds per ton; added to the previous 11 months emissions in tons VOC	C		
V.2.	Emissions testing if required.	C		

	Procedures specified in 40 CFR Part 60, Appendix A, Method 22.			
V.3.	Multiplying the allowable particulate emission rate of 0.030 gr/dscf by the maximum flow rate of the control equipment, times the actual hours of operation during the calendar year, and then divide by 2000 lbs/ton	C		
V.4.	One time calculation of the maximum tons of sand processed in this emission unit per hour, 5 tons/hour, multiplied by the VOC emission factor of 0.65 lb of VOC/ton of sand	C		
VI.	N/A	N/A	N/A	N/A

I. Significant Emissions Unit ID [4 characters]: F015

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1.	N/A	N/A	N/A	N/A
I.2.a.	N/A	N/A	N/A	N/A
II.	N/A	N/A	N/A	N/A
III.	N/A	N/A	N/A	N/A
IV.	N/A	N/A	N/A	N/A
V.	N/A	N/A	N/A	N/A
VI.	N/A	N/A	N/A	N/A

I. Significant Emissions Unit ID [4 characters]: F016

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1.	N/A	N/A	N/A	N/A
I.2.a.	N/A	N/A	N/A	N/A
II.	N/A	N/A	N/A	N/A
III.	N/A	N/A	N/A	N/A
IV.	N/A	N/A	N/A	N/A
V.	N/A	N/A	N/A	N/A
VI.	N/A	N/A	N/A	N/A



I. Significant Emissions Unit ID [4 characters]: F017

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1.	N/A	N/A	N/A	N/A
I.2.a.	N/A	N/A	N/A	N/A
II.	N/A	N/A	N/A	N/A
III.	N/A	N/A	N/A	N/A
IV.	N/A	N/A	N/A	N/A
V.	N/A	N/A	N/A	N/A
VI.	N/A	N/A	N/A	N/A

I. Significant Emissions Unit ID [4 characters]: F019

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?"	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1.	N/A	N/A	N/A	N/A
I.2.a.	N/A	N/A	N/A	N/A
II.	N/A	N/A	N/A	N/A
III.	N/A	N/A	N/A	N/A
IV.	N/A	N/A	N/A	N/A
V.	N/A	N/A	N/A	N/A
VI.	N/A	N/A	N/A	N/A

I. Significant Emissions Unit ID [4 characters]: F019

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?"	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1.	N/A	N/A	N/A	N/A
I.2.a.	N/A	N/A	N/A	N/A
II.	N/A	N/A	N/A	N/A
III.	N/A	N/A	N/A	N/A
IV.	N/A	N/A	N/A	N/A
V.	N/A	N/A	N/A	N/A
VI.	N/A	N/A	N/A	N/A

I. Significant Emissions Unit ID [4 characters]: F020

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1.	N/A	N/A	N/A	N/A
I.2.a.	N/A	N/A	N/A	N/A
II.	N/A	N/A	N/A	N/A
III.	N/A	N/A	N/A	N/A
IV.	N/A	N/A	N/A	N/A
V.	N/A	N/A	N/A	N/A
VI.	N/A	N/A	N/A	N/A

I. Significant Emissions Unit ID [4 characters]: K002

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1. 3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit	Record keeping requirements and formulation data or USEPA Method 24	C		
I.1. 20% opacity as a 6-minute average	Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60, as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rules 3745-17-03, if required	C		
I.1. 0.551 lb/hr of particulate emissions	Calculations E = maximum coating solids usage rate (in lbs/hr) X (1-TE) X (1-CE), where E = particulate matter emissions rate (lbs/hr), TE = transfer efficiency, CE = control efficiency	C		
I.2.a.	N/A	C		
II.	N/A	C		
III.1.	Monthly records will be maintained on-site.	C		
III.2.	Daily records will be maintained on-site	C		
IV.1.	Copies of any notifications of non-complying coatings will be maintained on-site.	C		
IV.2.	Copies of any notifications identifying when the dry filtration is not in service and the unit was in operation will be maintained on-site.	C		
V.1.	Record keeping requirements and formulation data or USEPA Method 24	C		
V.2.	Test Method 9 as set forth in	C		

	"Appendix on Test Methods" in 40 CFR, Part 60, as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rules 3745-17-03, if required			
V.3.	<p>Calculations</p> <p><math>E = \text{maximum coating solids usage rate (in lbs/hr)} \times (1 - TE) \times (1 - CE)</math>, where <math>E</math> = particulate matter emissions rate (lbs/hr), <math>TE</math> = transfer efficiency, <math>CE</math> = control efficiency</p>	C		
VI.	N/A	N/A	N/A	N/A

I. Significant Emissions Unit ID [4 characters]: K005 – This unit has been removed

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?"	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
N/A – Unit removed from service.				

I. Significant Emissions Unit ID [4 characters]: K006

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1. 3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit	Record keeping requirements and formulation data or USEPA Method 24	C		
I.1. 20% opacity as a 6-minute average	Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60, as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rules 3745-17-03, if required	C		
I.1. 1.91 lbs/hr of particulate emissions	Calculations E = maximum coating solids usage rate (in lbs/hr) X (1-TE) X (1-CE), where E = particulate matter emissions rate (lbs/hr), TE = transfer efficiency, CE = control efficiency	C		
I.2.a.	N/A	C		
II.1.	N/A	C		
III.1.	Monthly records will be maintained on-site.	C		
III.2.	Daily records will be maintained on-site	C		
IV.1.	Copies of any notifications of non-complying coatings will be maintained on-site.	C		
IV.2.	Copies of any notifications identifying when the dry filtration is not in service and the unit was in operation will be maintained on-site.	C		
V.1.	Record keeping requirements and formulation data or USEPA Method 24	C		



V.2.	Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60, as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rules 3745-17-03, if required	C		
V.3.	Calculations E = maximum coating solids usage rate (in lbs/hr) X (1-TE) X (1-CE), where E = particulate matter emissions rate (lbs/hr), TE = transfer efficiency, CE = control efficiency	C		
VI.	N/A	N/A	N/A	N/A

I. Significant Emissions Unit ID [4 characters]: K007

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?"	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1.	N/A	C		
I.2.a.	N/A	C		
II.	N/A	N/A	N/A	N/A
III.1.	N/A	C		
IV.1.	N/A	C		
V.	N/A	N/A	N/A	N/A
VI.	N/A	N/A	N/A	N/A

I. Significant Emissions Unit ID [4 characters]: K008

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1.	N/A	C		
I.2.a.	Records that identify each liquid organic material employed and whether or not the material is photochemically reactive.	C		
II.	N/A	N/A	N/A	N/A
III.1.	N/A	C		
IV.1.	Copies of any notifications of non-complying coatings will be maintained on-site.	C		
V.	N/A	N/A	N/A	N/A
VI.	N/A	N/A	N/A	N/A

I. Significant Emissions Unit ID [4 characters]: K009

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1. 10 lbs/hr of VOC	Record keeping. Emission testing in accordance with USEPA Method 25, if required	C		
I.1. 30 tpy of VOC based upon a rolling, 12-month summation	Record keeping requirements and formulation data or USEPA Method 24	C		
I.2.a.	N/A	C		
I.2.b.	N/A	C		
II.	N/A	N/A	N/A	N/A
III.1.	Copies of daily records will be maintained.	C		
III.2.	Copies of monthly records will be maintained.	C		
III.3.	Copies of records will be maintained.	C		
IV.1.	Copies of monthly notifications will be maintained.	C		
IV.2.	Copies of deviation reports will be maintained.	C		
IV.3.	Copies of deviation reports will be maintained.	C		
IV.4.	Copies of annual reports will be maintained.	C		
V.1.	Record keeping. Emission testing in accordance with USEPA Method 25, if required	C		
V.2.	Record keeping requirements and formulation data or USEPA Method 24	C		
VI.	N/A	N/A	N/A	N/A

I. Significant Emissions Unit ID [4 characters]: P020

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1.	N/A	N/A	N/A	N/A
I.2.a.	N/A	N/A	N/A	N/A
I.2.b.	N/A	N/A	N/A	N/A
II.	N/A	N/A	N/A	N/A
III.	N/A	N/A	N/A	N/A
IV.	N/A	N/A	N/A	N/A
V.	N/A	N/A	N/A	N/A
VI.	N/A	N/A	N/A	N/A

I. Significant Emissions Unit ID [4 characters]: P033

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1. 0.020 lb of particulate emissions per mmBtu of actual heat input	Multiplying the maximum hourly fuel flow rate (mmscf/hr) by the AP-42 particulate emission factor (1.9 lbs or particulate emissions per mmscf) and dividing the product by the maximum heat input (mmBtu/hr). Emissions testing if required.	C		
I.1. 20% opacity as a 6-minute average	If required, Visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1)	C		
I.2.	N/A	N/A	N/A	N/A
II.1.	N/A	C		
III.1.	Records will be maintained of the type and quantity of any fuel burned other than natural gas.	C		
IV.1.	Copies of any deviation reports when fuel is burned that is other than natural gas.	C		
V.1.	Multiplying the maximum hourly fuel flow rate (mmscf/hr) by the AP-42 particulate emission factor (1.9 lbs or particulate emissions per mmscf) and dividing the product by the maximum heat input (mmBtu/hr). Emissions testing if required.	C		
V.2.	If required, Visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1)	C		
VI.	N/A	N/A	N/A	N/A

I. Significant Emissions Unit ID [4 characters]: P901

J. Provide for each term and condition in Part III (A) "State and Federally Enforceable Section" for the emissions unit, by appropriate paragraph citation, a brief statement of how certification of compliance has been determined for each term and condition and a summary of all excursions/deviations that have occurred during the compliance certification period.

Identify the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Continuous (C) or Intermittent (I) Compliance?*	Excursions/Deviations	
			Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
I.1. 50 lbs/hr of particulate emissions	Particulate emission testing as required.	C		
I.1. 20% opacity as a 6-minute average	Visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1)	C		
I.2.a.	N/A	C		
II.1.	N/A	I	Report submitted April, July, and October of 2004 and January 2005	
II.2.	N/A	I	Report submitted April, July, and October of 2004 and January 2005	
III.1.	N/A	I	Report submitted April, July, and October of 2004 and January 2005	
III.2.	N/A	I	Report submitted April, July, and October of 2004 and January 2005.	
III.3.	N/A	C	Report submitted April, July, and October of 2004 and January 2005	
IV.1.	N/A	C	Report submitted April, July, and October of 2004 and January 2005	
IV.2.	N/A	C		
V.1.	N/A	C		
V.2.	N/A	C		
VI.	N/A	N/A	N/A	N/A

- K. Any other material information that may indicate non-compliance with one or more of the above-described applicable requirements for this facility must be described below:

**None**



## Compliance Certification Section V - Responsible Official Signature Statement

Complete this section of the form only once for the facility.

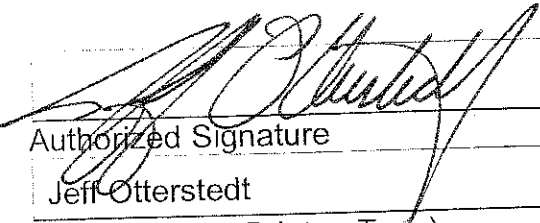
### Signature for Title V Compliance Certification:

This statement shall be signed by a responsible official as defined in OAC rule 3745-77-01(GG).

Making of any false material statement, representation or certification constitutes a violation of ORC 3704.05(H), and subjects the responsible party signing this statement to civil and/or criminal penalties as provided in ORC 3704.06(C) and ORC 3704.99(B).

### **CERTIFICATION:**

I, being the individual specified in OAC rule 3745-77-03(D), hereby affirm that, based on information and belief formed after reasonable inquiry, the statements made in this Title V Compliance Certification, which I signed on this 29th day of April, 2005 are true, accurate and complete to the best of my knowledge.

	4-29-05
Authorized Signature	Date
Jeff Otterstedt	
Name (Please Print or Type)	
Vice President/General Manager	
Title (Please Print or Type)	

**Note:** A copy of this Title V Compliance Certification ( Sections I through V) for the preceding calendar year must be submitted by April 30 or the date specified in General Term and Condition Part I.A.12.d to both the Director of the Ohio Environmental Protection Agency c/o the appropriate Ohio EPA District Office or local air agency and the Administrator of the United States Environmental Protection Agency c/o Director, Air and Radiation Division, U.S. EPA Region 5, 77 W. Jackson Blvd., R-19J, Chicago, Illinois 60604. It is recommended that these compliance certifications be sent by certified mail to both parties.



O.E.P.A.  
S.E.D.O.

CLOW WATER SYSTEMS COMPANY

**JEFF OTTERSTEDT**

Vice President and General Manager

2005 APR 19 AM 11:30

2266 South Sixth Street  
P.O. Box 6001  
Coshocton, Ohio 43812  
(740) 622-6651  
FAX (740) 622-8551

April 18, 2005

Zach Hamlin  
Division of Air Pollution Control  
Ohio Environmental Protection Agency Southeast District Office  
2195 Front Street  
Logan, Ohio 43138-9031

Reference: 1<sup>st</sup> Quarter 2005 – Deviation Report

Dear Mr. Hamlin:

Enclosed is the 1<sup>st</sup> quarter report. As requested, Clow is including the below verbiage from the General Terms and Conditions in the Title V Permit. "Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate and complete."

Sincerely,

Jeff S. Otterstedt  
Vice President and General Manager

## 1<sup>st</sup> Quarter 2005 Report

I have reviewed the 4th quarter records on the following emission units and have found the following:

Unit	Parameters	Findings
F002	Visible emissions	No deviations
F014	VOC limits	No deviations
	Visible emissions	No deviations
K002	Non-compliant coatings	None used
	Filtration system	No deviations
K005	Non-compliant coatings	None used
K006	Non-compliant coatings	None used
	Filtration system	No deviations
K007	Non-compliant coatings	None used
K008	Non-compliant coatings	None used
K009	Non-compliant coatings	None used
	VOC limits	No deviations
P033	Non-compliant fuels	None used
P901	1) Exhaust gases burned at 1300°F min.	See attached
	2) Minimum 35" H <sub>2</sub> O DP across venturi	See attached

### Emission Unit P901 – Cupola

#### Afterburner Temperature < 1300 F

Date	Duration (minutes)	Cause	Conclusion
1/14/05	2	Full ladle	
1/17/05	7	Full ladle/unknown	
1/26/05	2	Full ladle	
1/27/05	5	Unknown	
2/11/05	7	Unknown	
2/14/05	1	Full ladle	
2/18/05	4	Unknown/full ladle	
2/22/05	7	Full ladle	
2/24/05	14	Shut down for metallic hopper	
2/25/05	2	Full ladle	
3/4/05	6	Full ladle	
3/15/05	5	Unknown	
3/31/05	13	Foreharth spout frozen	Shut cupola down

Missing Data 01/31/ 05 start to 07:44

Missing Data 03/04/05 02:57– 10:21

Note: WWTP operator accidentally turned a water valve that supplies the wet cap with water. When the water supply to the wet cap is interrupted for any reason, the cap opens (to prevent physical damage) and the combustion air is shut off through an interlock.

### Delta Pressure < 35 inches

Date	Duration (min)	Cause	Conclusion
1/3/05	30	Unknown	
1/4/05	210	Unknown	
1/5/05	60	Ring Jet	
1/17/05	60	Ring Jet frozen	
1/18/05	60	Unknown	
1/19/05	90	Unknown	
1/20/05	60	Unknown	
1/26/05	30	Unknown	
2/3/05	90	Ring Jet off	
2/7/05	30	Unknown	
2/14/05	60	Unknown	
3/15/05	90	Pressure lines plugged	Unplugged pressure lines
3/18/05	30	Unknown	
3/22/05	150	Unknown	

Missing Data 1/31/ 05 start to 7:44 am.



O.E.P.A.  
S.E.D.O.

CLOW WATER SYSTEMS COMPANY

JEFF OTTERSTEDT

Vice President and General Manager

2005 JAN 31 PM 1:04

2266 South Sixth Street  
P.O. Box 6001  
Coshocton, Ohio 43812  
(740) 622-6651  
FAX (740) 622-8551

January 28, 2005

Zach Hamlin  
Division of Air Pollution Control  
Ohio Environmental Protection Agency, Southeast District Office  
2195 Front Street  
Logan, OH 43138-9031

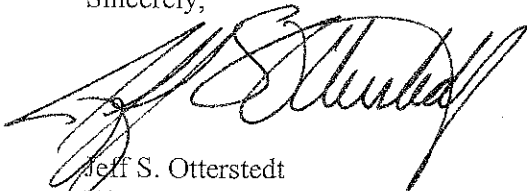
Reference: 4<sup>th</sup> Quarter 2004 – Deviation Report

Dear Mr. Hamlin:

Enclosed is our Title V deviation report for the 4<sup>th</sup> calendar quarter of 2004.

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate and complete.

Sincerely,



Jeff S. Otterstedt  
Vice President and General Manager

Hamlin  
FOI4 K009

ha  
Enclosure

## 4<sup>th</sup> Quarter 2004 Report

4<sup>th</sup> Quarter records revealed the following concerning these specific emission units:

Unit	Parameters	Findings
F002	Visible emissions	No deviations
F014	VOC limits	No deviations
	Visible emissions	No deviations
	Total VOC Emissions (annual	0.52 tons
K002	Non-compliant coatings	None used
	Filtration system	No deviations
K005	Non-compliant coatings	None used
K006	Non-compliant coatings	None used
	Filtration system	No deviations
K007	Non-Compliant coatings	None used
K008	Non-compliant coatings	None used
K009	Non-compliant coatings	None used
	VOC limits	No deviations
	Total VOC Emissions (annual	2.71 tons
P033	Non-compliant fuels	None used
P901	1) Exhaust gases burned at 1300° F min.	See attached
	2) Minimum 35" H <sub>2</sub> O DP across venturi	See attached

## Emission Unit P901 – Cupola

### Afterburner Temperature < 1300 F

Date	Duration (minutes)	Cause	Conclusion
10/1/04	47	unknown	
10/5/04	15	unknown	
10/6/04	9	unknown	
10/7/04	45	Afterburner not working	Fix afterburner
10/8/04	20	unknown	
10/11/04	43	Afterburner not working	Fix afterburner
10/12/04	4	Afterburner not working	Fix afterburner
10/13/04	8	Afterburner not working	Fix afterburner
10/14/04	3	Afterburner not working	Fix afterburner
10/15/04	20	unknown	
10/18/04	2	unknown	
10/19/04	11	Afterburner auto stuck not working	Fixed afterburner
10/20/04	1	unknown	
10/27/04	5	unknown	
10/28/04	23	unknown	
10/29/04	8	unknown	
11/09/04	2	unknown	
11/12/04	7	unknown	
12/13/04	2	unknown	